



SYNTHETIC ORGANIC CHEMICAL MANUFACTURERS ASSOCIATION, INC.
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June 20, 2000

Mr. Jere W. Glover
Chief Counsel for Advocacy
U.S. Small Business Administration
Office of Advocacy
409 Third St., S.W.
Washington, DC 20416

Dear Mr. Glover:

On behalf of the Synthetic Organic Chemical Manufacturers Association (SOCMA), I am writing to express our appreciation for the important role that you and the U.S. Small Business Administration's (SBA) Office of Advocacy play in today's federal regulatory system. As you are aware, SOCMA is a trade association representing batch and custom chemical manufacturers, a highly innovative, entrepreneurial and customer-driven sector of the chemical industry. More than 2,000 batch processing facilities produce 50,000 of the specialty and custom chemicals manufactured in the U.S. at a value about \$60 billion annually. SOCMA members are representative of these facilities, which are typically small businesses with fewer than 75 employees and less than \$100 million in annual sales.

Like most of the companies we represent, SOCMA staff resources are limited. The information and opportunities provided by your office are valuable assets to SOCMA. One of the most important activities conducted by the Office of Advocacy is the monthly environmental roundtable meeting. These meetings provide SOCMA and others with a strategic opportunity to keep apprised of the latest issues, trends, proposals and reinvention programs underway at the U.S. Environmental Protection Agency (EPA) and other federal agencies. Not only are pertinent issues addressed in full detail, the roundtable provides an opportunity to discuss points of agreement and concern with agency representatives responsible for development and implementation of the issues at hand. In addition to program specific dialogue, the roundtable meetings also provide a direct point of contact with numerous other government representatives. For example, EPA's Small Business Ombudsman, and congressional House and Senate Small Business Committee staff are often in attendance. The opportunity to speak with such a variety of people in one forum saves valuable SOCMA time and resources.

Also of great importance to SOCMA and the small business community is the role of the Office of Advocacy in the regulatory process. It brings us great comfort to



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know that the views and positions of small business are represented at times when public participation is precluded. For example, the work of the Office of Advocacy before EPA proposed its amendments to the Inventory Update Rule (IUR) under the Toxic Substances Control Act (TSCA) influenced the EPA to amend portions of the proposal beneficial to SOCMA members before it was published.

Most recently, the Office of Advocacy provided support and leadership in an EPA enforcement initiative concerning reporting errors under the Toxics Release Inventory. Since the "violations" at issue are technical reporting errors that pose no environmental threat, a coalition of small business trade associations successfully negotiated compromised terms that saved some companies up to \$15,000 while correcting the paperwork errors. Such a balanced agreement is due in large part to the involvement of the SBA.

The Office of Advocacy is also instrumental in keeping SOCMA and others in the small business community involved with the latest developments regarding the implementation of the Small Business Regulatory Enforcement Fairness Act (SBREFA).

SOCMA appreciates the lasting commitment of the Office of Advocacy to represent and preserve the competitiveness of U.S. small business. If we can be of service to you, please do not hesitate to call me at (202) 721-4197.

Sincerely,


Edmund Fording
President